201-16282

June 8, 2006

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

HEADQUARTERS
501 FRONT STREET
NORFOLK, VA 23510
TEL 757-622-PETA
FAX 757-622-0457

Mr. Stephen Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 110 1 -A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Public Comments on Arkema Inc.'s HPV Challenge Program Test Plan for Tetradecyloxirane (CAS No. 7320-38-7).

The following comments on Arkema Inc.'s test plan for tetradecyloxirane are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

Tetradecyloxirane is used as a chemical intermediate with controlled transport. It is consumed and converted during processing. As a result, there is essentially no potential for repeat or public exposure.

We commend Arkema Inc. for its comprehensive review of existing data, which identified reliable data for tetradecyloxirane for all relevant toxicity endpoints in animals. For closed system intermediates with limited exposure potential, such as tetradecyloxirane, program guidelines allow for reduced testing. While no developmental toxicity data is cited for tetradecyloxirane, Arkema Inc. used existing data for hexadecene, which has already been considered under the HPV program as a member of the higher alpha olefms category, in order to fill the developmental toxicity endpoint. Tetradecyloxirane is a metabolite of hexadecene and both are ultimately converted to
Hexadecene did not elicit developmental effects at doses up to the limit dose of 1000 mg/kg in rats. Since the ultimate metabolite is the same for both compounds,, no developmental effects are anticipated for tetradecyloxirane. This approach is consistent with the EPA's stated goals of maximizing the use of existing data in order to limit additional animal testing.

Thank you for your attention to these comments. I may be reached at 610-586-3975, or via e-mail at josephm@peta.org.

Sincerely,

Joseph Manuppello
Research Associate
Research & Investigations